

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ROCIO FRANCISCO, et al.,)	
)	
Plaintiffs,)	
)	Case No: 11 C 2162
v.)	
)	Judge Grady
REMEDIAL ENVIRONMENTAL)	
MANPOWER, INC. d/b/a REM STAFFING)	
and FERRARA PAN CANDY, INC.,)	
)	
Defendants.)	

**AGREED MOTION FOR PARTIES TO FILE JOINT MOTION FOR
PRELIMINARY APPROVAL OF CLASS SETTLEMENT**

Named Plaintiffs Rocio Francisco, Magdaleno Elizade, Maria Antonia Uriostequi, Martha Celestino and Maria Manriquez (“Plaintiffs”) and Defendants Remedial Environmental Manpower, Inc. d/b/a REM Staffing (“REM”) and Remedial Day Labor d/b/a RDL Staffing (“RDL”)(collectively “Defendants”), by their respective counsel, jointly move this Court for an extension of time to file a Joint Motion for Preliminary Approval of Class Settlement of this Matter. In support of their motion, the Parties state as follows:

1. Plaintiffs filed their complaint on March 29, 2011 alleging violations of the Fair Labor Standards Act, 29 U.S.C. § 201, *et seq.* (“FLSA”), the Illinois Minimum Wage Law, 820 ILCS §105/1, *et seq.* (“IMWL”), the Illinois Wage Payment and Collection Act, 820 ILCS §115/1, *et seq.* (“IWPCA”) and the Illinois Day and Temporary Labor Services Act, 820 ILCS §175/1, *et seq.* (“IDTLSA”). Plaintiffs also seek to represent a class of similarly situated plaintiffs.

2. On October 5, 2011, the Parties reported reaching a settlement in principle in this matter on a class-wide basis.

3. This Court set a hearing for November 9, 2011 on the Parties' anticipated motion for preliminary approval of class settlement.

4. Since that time, the Parties have worked diligently together to memorialize the terms of the Agreement and to prepare a Joint Motion for Preliminary Approval the Class Settlement, For Approval of Class Certification, Form and Manner of Class Notice and the Scheduling of a Fairness Hearing and Final Approval of the Settlement. The documents, with attachments exceed 90 pages.

5. While Counsel for the Parties have general agreement on the language in each of these filings, the Parties' Counsel continue to work through some final details and need additional time to review the documents with their respective clients for approval.

6. The Parties agree that it is reasonable to believe that the necessary documents to be filed will be finalized within the next two weeks, with sufficient time to file and notice up the Motion for Preliminary Approval with the Stipulation of Agreement for hearing on November 30, 2011 at 10:30 a.m.

7. Therefore, the Parties jointly request this Court strike the November 9, 2011 hearing date and re-set the hearing date for November 30, 2011 at 10:30 a.m.

WHEREFORE, the Parties respectfully request an extension of time to file their Joint Motion for Preliminary Approval with the Stipulation of Agreement until November 23, 2011 and re-set the hearing on the Parties' Motion for November 30, 2011 at 10:30 a.m., and striking the hearing currently set for November 9, 2011 at 10:30 a.m. or for such other relief as this Court deems just.

Respectfully Submitted,

For Plaintiffs:

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Dated: November 4, 2011

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Dated: November 4, 2011